

## REMARKS

Claims 1-24 are pending.

The final Office Action mailed June 3, 2005 rejected claims 1-5, 8, 11, 17, 20, and 22 under 35 U.S.C. § 103(a) as obvious based on *Baker et al.* (U.S. 5,226,118) in view of *Haneda et al.* (U.S. 6,016,502), claims 6, 7, 9-10, 12-16, 18-19, and 21 under 35 U.S.C. § 103(a) as obvious based on *Baker et al.* in view of *Haneda et al.* and further in view of *Linsey et al.* (U.S. 6,791,582), and claims 23 and 24 under 35 U.S.C. § 103(a) as obvious based on *Baker et al.* in view of *Haneda et al.* and further in view of *Schwerdtfeger et al.* (U.S. 6,725,424).

Applicant respectfully traverses the rejection of claims 1-24, as none of the applied references, alone or in any reasonable combination, suggest or disclose the features of the claims.

For example, independent claim 1 recites:

1. A computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions arranged, upon processing by a rendering agent, to cause one or more processors executing the rendering agent to perform the steps of:  
displaying simultaneously a first chart and a second chart;  
detecting an event relating to the first chart; and  
in response to the event, replacing the second chart with a third chart so as to display simultaneously the first chart and the third chart.

In stark contrast, *Baker et al.* (per Abstract) is directed to a data analysis system in which charts are displayed by either (1) selecting a defined chart, or (2) by selecting a chart group and then selecting one or more charts from the selected group, and then simultaneously displaying the selected data analysis charts. *Baker et al.* is not concerned with any type of markup language, much less any type of markup language to be rendered by a rendering agent.

The Office Action (pp. 2-3) correctly acknowledges that *Baker et al.* fails to disclose “detecting an event relating to the first chart,” and then states, “However, Haneda mentions related information (Haneda Col 11 Lines 45-48). It would have been obvious to one of ordinary Oracle Matter No. 10

skill in the art at the time of the invention to apply Haneda to Baker, providing Baker the benefit of detecting related information for the benefit of displaying the charts correctly.”

However, *Haneda et al.* fails to cure *Baker et al.*’s lack of disclosure concerning the features recited by claim 1. Rather, *Haneda et al.* (per Abstract) merely involves a data processing apparatus which displays chart data in the form of a chart such as a spreadsheet. When an input device is used to instruct deletion of a row or column of the chart, the row or column is deleted, the remaining rows or columns are moved closer together, and the chart is accordingly edited and displayed. Simultaneously, at the position where the row or column is deleted, an identifier is displayed. When a coordinate input device is touched on the identifier, the deleted column is restored and displayed at the original position. *Haneda et al.* too is not concerned with any type of markup language, much less any type of markup language to be rendered by a rendering agent. Furthermore, the Office Action’s vague reference to “Haneda mentions related information” does not support a rejection regarding the specific claim language “detecting an event relating to the first chart; and in response to the event, replacing the second chart with a third chart so as to display simultaneously the first chart and the third chart.”

In the “Response to Arguments” section, the Office Action (p. 12) states:

The applicant also argues that Haneda fails to disclose the limitations not taught by Baker (Page 20 Para 3). However, Haneda mentions related information (Haneda Col 11 Lines 45-48) and Haneda shows charts (Figure 5 and Figure 11), which certain rows can be deleted (Figure 7 and 8) and it is understood that certain rows can be deleted and the remaining rows can shift together.

However, the Office Action continues to ignore the claim language “in response to the event, replacing the second chart with a third chart so as to display simultaneously the first chart and the third chart” and the “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions arranged, upon processing by a rendering agent, to cause one or more processors executing the rendering agent to Oracle Matter No. 11

perform the steps" recited by claim 1. Applicant respectfully submits that these features are not suggested by any combination of the cited references, and thus the rejection of claim 1 should be withdrawn.

For reasons similar to those discussed above with regard to claim 1, the rejection of claim 17 should also be withdrawn.

The rejections of dependent claims 2-5, 8, 20, and 22 should also be withdrawn for reasons similar to their respective independent claims, and these claims are separately patentable on their own merits.

Independent claim 11 recites:

11. A computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions embodied on a single web page comprising:  
a map element specifying an image map;  
a first image element referencing the first chart and the image map specified by the map element; and  
a second image element referencing the second chart;  
wherein the map element includes an area element that has an event attribute specifying replacement of the second chart with a third chart in response to an event.

In its rejection of claim 11, the Office Action (p. 4) merely states, "claim 11 reflects similar subject matter claimed in claim 8 and is rejected along the same rationale." However, this completely ignores the combination recited by claim 11, and more particularly does not address the fact that claim 11 is directed to a "computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions embodied on a single web page comprising" the features as shown above. Applicant respectfully submits that no combination of the cited references suggest these features, and thus the rejection of claim 11 should be withdrawn.

Independent claim 12 recites:

12. A computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions embodied on a single web page comprising:  
a map element specifying an image map;  
a first image element referencing a first image to be rendered in a first area and the image map; and  
a second image element referencing a second image to be rendered in a second area;  
wherein the map element includes an area element that has:  
a shape attribute specifying a geometry that overlaps at least part of the first area and does not overlap the second area; and  
an event attribute specifying replacement of the second image with a third image in response to an event.

In its rejection of claim 12 (pp. 7-8), the Office Action again ignores the fact that claim 12 is directed to a “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions embodied on a single web page comprising” the features as shown above for claim 12.

*Linsey et al.*, cited by the Office Action in its rejection of claim 12, is directed to a collaboration space object model for providing a place consisting of rooms created by clients interacting with a client browser. Although *Linsey et al.* discusses the use of HTTP and HTML, e.g., to display documents, *Linsey et al.* fails to suggest using markup language as recited by any of the claims. More particularly, *Linsey et al.* fails to disclose or suggest “instructions embodied on a single web page comprising” the features as shown above for claim 12.

Applicant respectfully submits that, in its rejection of claim 9, regarding a feature recited as “wherein the instructions in the markup language are embodied on a single web page,” the Office Action (pp. 6-7) correctly acknowledges that *Baker et al.* does not disclose the feature, and then states, “However, Linsey mentions a document displayed on a browser and it is known [sic] that a browser contains web pages (Linsey Col 29 Lines 1-19). It would have been obvious

to one of ordinary skill in the art at the time of the invention to apply Linsey to Baker, providing Baker the benefit of having a web page compatible with browsers for the user to read.” This rejection completely ignores the specific claim language “the instructions in the markup language are embodied on a single web page,” which is neither disclosed nor suggested by any of the cited references.

Further, in its rejection of dependent claim 10, regarding a feature recited as “wherein the step of replacing the second chart with the third chart is performed without loading another web page,” the Office Action (p. 7) correctly acknowledges that *Baker et al.* does not disclose the feature, and then states (emphasis added), “However, Linsey mentions a document displayed on a browser and it is known [sic] that a browser contains web pages not *reloaded* (Linsey Col 29 Lines 1-19). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Linsey to Baker, providing Baker the benefit of having a web page compatible with browsers for the user to read.” This rejection again completely ignores the specific claim language “without loading another web page,” which is neither disclosed nor suggested by any of the cited references.

Independent claim 21 recites:

21. A computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions comprising:  
a first map element specifying a first image map;  
a second map element specifying a second image map;  
a first image element referencing a first image to be rendered in a first area and the first image map;  
a second image element referencing a second image to be rendered in a second area and the second image map; and  
a third image element referencing a third image to be rendered in a third area;  
wherein the first map element includes an area element that has:  
a shape attribute specifying a geometry that overlaps at least part of the first area and does not overlap the second area; and  
an event attribute specifying replacement of the second image map with a third image map in response to an event.

In its rejection of claim 21, the Office Action (pp. 10-11) again ignores “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions comprising” the features recited by claim 21. Similarly as discussed above, the cited references do not disclose or suggest these features. Thus, the rejection of claim 21 should be withdrawn.

In its rejection of claims 23 and 24, the Office Action (p.11) cites *Schwerdtfeger et al.* as supposedly mentioning “Document object models that are used in the process (Schwerdtfeger Col 3 Lines 25-30)” and “Schwerdtfeger mentions a mouse over process (Schwerdtfeger Col 9 Lines 38-52).” *Schwerdtfeger et al.* (per col. 3: 10-28) is directed to an electronic document delivery system including a client machine coupled to (i.e., in wired or wireless communication with) a transcoder proxy. The client machine may be a palmtop or handheld computer or a wireless communication device with limited memory and/or processing capability. The client machine may include an assistive technology device for presenting information to a user (e.g., a Braille display or a speech engine). The transcoder proxy is coupled to receive electronic documents. The electronic documents are expressed in a first digital format (e.g., a text-based markup language such as HTML or XML). Each electronic document includes at least one element. The transcoder proxy assigns a unique identifier to each of the elements, and forms a model of a logical structure of the electronic document. The model may also define methods for accessing and manipulating the document. The model may be a document object model (DOM).

*Schwerdtfeger et al.* fails to cure the deficiencies of *Baker et al.*, *Haneda et al.*, and *Linsey et al.* as discussed above. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180

USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). M.P.E.P. § 2143.03 Applicant respectfully submits that these features are neither suggested nor disclosed by any reasonable combination of the applied references.

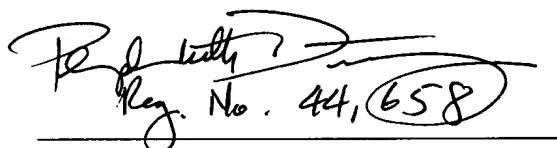
Thus, the rejections of claims 1-24 should be withdrawn.

Therefore, the present application overcomes the objections and rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at 703-425-8501 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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